

BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF DELAWARE

IN THE MATTER OF THE APPLICATION OF :  
SUEZ WATER DELAWARE INC. :  
CONCERNING THE SEMI ANNUAL :  
ADJUSTMENT TO THE DISTRIBUTUION :  
SYSTEM IMPROVEMENT CHARGE ("DSIC") :  
EFFECTIVE JULY 1, 2018 PURSUANT TO :  
26 DEL. C. § 314(b)(5) :

Docket No. 18-0899

MOTION FOR RECONSIDERATION

1. On June 5, 2018, pursuant to 26 Del. C. § 314(b)(5) and 26 Del. Admin. C. 1009 §2.1, SUEZ Water Delaware Inc. ("SWDE" or the "Company") filed with the Delaware Public Service Commission (the "Commission") via DelaFile an application for the adjustment of its Distribution System Improvement Charge ("DSIC") to become effective on July 1, 2018 (the "June 2018 DSIC Filing"). A true and correct copy of the June 2018 DSIC filing is attached hereto as Exhibit A.

2. On June 12, 2018, SWDE received a certified letter from the Commission's Secretary advising that the June 2018 DSIC Filing had been rejected because:

it does not comply with the requirements set forth in 26 *Del. C. § 314(b)(4)* and 26 *Del. Admin. C. § 1009.2.1*. Specifically, 26 *Del. C. § 314(b)(4)* mandates that "[t]he public water utility **shall file** any request for a change in the DSIC rate and supporting data with the Commission **at least 30 days prior to its effective date.**" (Emphasis added). Accordingly, SWDE's application for adjustment of its DSIC to become effective on July 1, 2018, was required to have been filed no later than May 31, 2018.

A true and correct copy of the June 12, 2018 letter is attached hereto as Exhibit B.

3. Thereafter, on June 15, 2018, SWDE responded by letter to the Commission Secretary, and was informed on June 26, 2018 that a motion for

reconsideration would be required in order for the Commission to reconsider the rejection of the June 2018 DSIC Filing. This motion followed. A true and correct copy of the June 15, 2018 letter is attached hereto as Exhibit C.

4. First and foremost, the Company acknowledges that for the first time since the DSIC mechanism was granted for SWDE it was late in making the June 2018 DSIC Filing, missing the regulatory cut-off date of May 31, 2018 by three (3) business days. However, the late filing was inadvertently made late as a result of recent staffing changes.

5. SWDE respectfully requests that the Commission reconsider its rejection of the June 2018 DSIC Filing. The Company understands and appreciates the need for the 30-day time period between the date of the filing of its application for a change in the DSIC rate and the implementation of the DSIC rate to allow adequate time for review of its proposed rate and scheduling for consideration by the Commission within such timeframe. Accordingly, the Company is not requesting that the DSIC rate be made effective on July 1, 2018 – which would have been only 25 days from the date of filing.

6. Rather, the Company is hereby requesting that the Commission consider granting a limited, one-time exception to the requirement that the DSIC rate be implemented on July 1, and instead allow the Company to implement the DSIC rate as of September 1, 2018 (utilizing the same DSIC rate as set forth in the June 2018 DSIC Filing). Thereby creating an abbreviated DSIC period from September 1, 2018 through January 1, 2019. Thereafter, SWDE's DSIC rate would be updated in accordance with

the statutory and regulatory requirements, as has always been done by the Company in the past with the exception of the June 2018 DSIC Filing.

7. Allowing implementation of SWDE's as-filed DISC rate on September 1, 2018 will allow sufficient time for the Commission and the parties to review the proposed DSIC rate adjustment, assuming that the Commission decides this Motion at its July 10, 2018 meeting. Further, allowing the implementation of the DSIC rate adjustment on September 1, 2018 will not adversely impact SWDE's customers.

8. For convenience, the Company has included with its Motion, as Exhibit D, revised Tariff pages to replace those included with its June 2018 DSIC Filing (Schedule 3) in order to reflect an effective date of September 1, 2018.

9. The Company, having acknowledged its inadvertent error, nevertheless believes that allowing it to implement the DSIC rate set forth in the June 2018 DSIC Filing at a later date – sufficient to allow for a 30-day review of the proposed rate – will not prejudice the rights of any party, nor would the grant of such relief prejudice the Company's customers. Rather, the only party that will be harmed as a result of the Commission's denial of the Company's requested relief herein is the Company, as it will not be able to timely recover its allowable return on the eligible investments made during the period from November 1, 2017 through April 30, 2018.

**WHEREFORE,** SUEZ Water Delaware Inc. respectfully requests that the Commission permit the Company to implement the DSIC rate set forth in the June 2018 DSIC Filing as of September 1, 2018.

Respectfully submitted,

**SUEZ Water Delaware Inc.**

By:   
David Stanton, President

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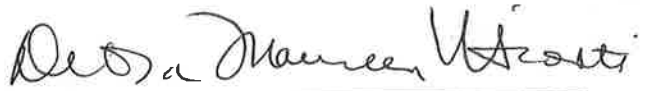
STATE OF New Jersey )  
COUNTY OF Bergen ) SS.

On this 28th day of June, 2018, personally came before me, the subscriber, a Notary Public in and for the State and County aforesaid, David Stanton, President for SUEZ Water Delaware, Inc., a corporation existing under the laws of the State of Delaware, party to this motion, known to me personally to be such, and acknowledged that he is authorized to make this verification on behalf of SUEZ Water Delaware Inc., and that the facts set forth in the foregoing Motion for Reconsideration are true and correct to the best of his knowledge, information and belief.



David Stanton

**SWORN TO AND SUBSCRIBED** before me this 28th day of June, 2018.



Notary Public  
My Commission Expires:

